

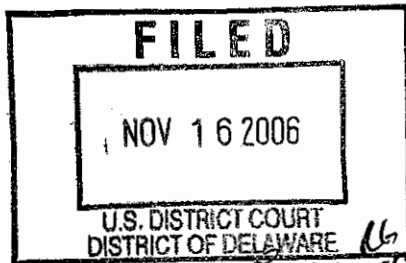
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Lorenzo P. Jones
Plaintiff

v.
Thomas Carroll, et al.,
Defendants.

Plaintiff's First
Request for Production
of Documents

Civil Action No.
06-129-KAS



Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff requests that Defendant's Thomas Carroll, Peter Forbes, Alisha Profaci and Joe Romella produce for inspection and copying the following documents:

1. The complete Prison Records of inmate Anibal Melendez SBI #00337929. All disciplinary write-ups, 404 incident reports, inmate grievances, and medical records including all mental health records and reports made outside of and within the Department of Correction.
2. All medical and mental health records of Plaintiff from the time of his incarceration in Delaware Correctional Center through and including the date of your response to this request.
3. All written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2006 made by Wilfred Beckles, Department of Correction.

4. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Jaime Nieves Jr., Department of Correction.

5. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Joseph S. Simon, Department of Correction.

6. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Timothy Timmons, Department of Correction.

7. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Kevin Hopkins, Sr. Department of Correction.

8. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Joseph Pennells, Department of Correction.

9. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Monica Watson, Department of Correction.

10. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Derrick Washington, Department of Correction.

11. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Alisha Profoli, Department of Correction.
12. all written and/or verbal statements, originals or copies identifiable as reports about the incident on September 12, 2005 made by Peter Forbes, Department of Correction.
13. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Raina Scott, Department of Correction.
14. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Anibal Melendez, inmate, Department of Correction.
15. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by George Davis, inmate, Department of Correction.
16. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Tent County Paramedics.
17. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Gloria Watson, Registered Nurse Correctional medical services.

Certificate of Service

I, Charles P. Jones, hereby certify that I have served a true

And correct copy(ies) of the attached: Plaintiff's First Request For

Production of Documents upon the following

parties/person (s):

TO: Clerk

TO: _____

'Delaware' District Court
Lock Box 18
844 King Street
'Wilmington' Delaware 19801

TO: Ophelia M. Waters

TO: _____

'Deputy Attorney General
820 North French Street
6th Floor
'Wilmington' Delaware 19801

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 13th day of September, 2006